

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROOT, INC. <i>et al.</i>,)	
)	
<i>Plaintiffs,</i>)	Judge Sarah D. Morrison
)	
v.)	Magistrate Judge Chelsey M. Vascura
)	
Brinson Caleb “BC” SILVER , <i>et al.</i>)	Case No. 2:23-cv-00512
)	
<i>Defendants.</i>)	

MOTION FOR REAPPOINTMENT OF RECEIVER

Jerry E. Peer, Jr. (the “Receiver”) of Peterson Connors LLP hereby respectfully moves this Court for an Order Reappointing Receiver to include additional property not previously specifically named in the Order Appointing Receiver (ECF 101). A memorandum in support of this motion is attached for this Court’s consideration.

Respectfully submitted,

PETERSON CONNORS LLP

/s/ Istvan Gajary
GREGORY S. PETERSON (0061915)
JERRY E. PEER, JR. (0075128)
ISTVAN GAJARY (0089084)
545 Metro Place South, Suite 435
Dublin, Ohio 43017
Telephone: 614.365.7000
Facsimile: 614.220.0197
gpeterson@petersonconnors.com
jpeer@petersonconnors.com
igajary@petersonconnors.com

Counsel for Receiver, Jerry E. Peer, Jr.

MEMORANDUM IN SUPPORT

Receiver was originally appointed pursuant to an initial brief Order (ECF 99) and a subsequent, more thorough Order Appointing Receiver (ECF 101) where three real properties were specifically identified. Since the filing of that Order Appointing Receiver, Mr. Peer has uncovered a fourth property located in California at 19803 Vista Del Otero, Ramona, California 92065. Like the others, this property is titled in the name of Eclipse Home Design LLC, as indicated in the attached California Assessor's report (**Exhibit A**). This property has not previously been disclosed or known to the Court. Receiver now seeks to have this property added to the list of properties specifically identified in Section III, Paragraph 1 of the Order Reappointing Receiver.

Expedited briefing on this motion is hereby requested.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of June 2023, a true and accurate copy of the foregoing *Motion for Reappointment of Receiver* was filed electronically using the Court's ECF system (which will electronically serve all represented parties) and mailed via certified mail to Paige McDaniel.

WILLIAM D. KLOSS, JR.
ELIZABETH S. ALEXANDER
GRACE E. SAALMAN
VORYS, SATER, SEYMOUR AND PEASE LLP
52 East Gay Street, P.O. Box 1008
Columbus, Ohio 43216-1008
Telephone: 614.464.6360
Facsimile: 614.719..4807
wdklossjr@vorys.com
esalexander@vorys.com
gesaalman@vorys.com
Counsel for Plaintiffs

MATTHEW L. JALANDONI
W. BENJAMIN REESE
FLANNERY GEORGALIS, LLC
175 S. Third Street, Suite 1060
Columbus, Ohio 43215
Telephone: 380.444.6027
Facsimile: 216.230.9041
mjalandoni@flannerygeorgalis.com
breese@flannerygeorgalis.com
*Counsel for Defendants, Brinson
Caleb Silver, Eclipse Home
Design, LLC, and Collateral
Damage, LLC*

MATTHEW D. RIDINGS
JAMAR T. KING
THOMPSON HINE LLP
127 Public Square, 3900 Key Center
Cleveland, Ohio 44114
Telephone: 216.566.5561
Facsimile: 216.566.5800
matt.ridings@thompsonhine.com
jamar.king@thompsonhine.com

*Counsel for Defendants, Quantasy &
Associates, LLC and William Campbell*

Paige McDaniel
5576 Alexanders Lake Rd.
Stockbridge, Georgia 30281

/s/ Istvan Gajary

ISTVAN GAJARY (0089084)



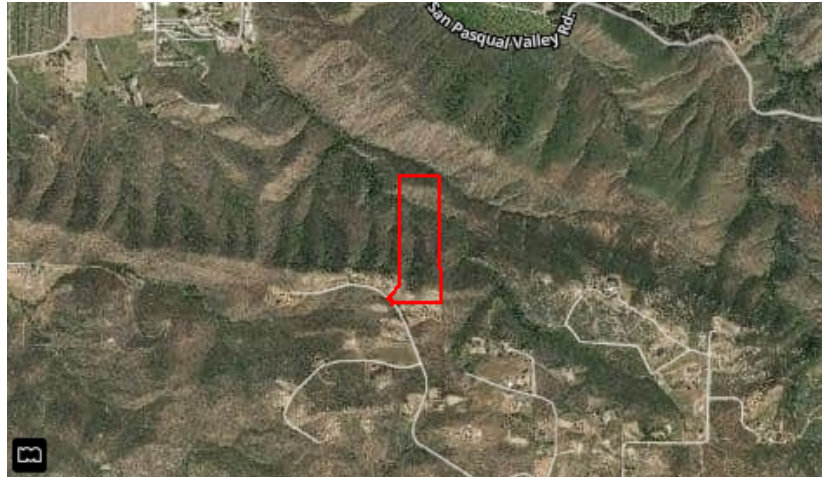
PARCELQUEST LITE

County - Jordan Z. Marks, Assessor

FULL PROPERTY DETAIL REPORT

Property Address:**19803 VISTA DEL OTERO RAMONA CA 92065-5807**Parcel # (APN):**276-160-03-00**

General Information

Parcel # (APN): **276-160-03-00**Owner: **ECLIPSE HOME DESIGN LLC**Mailing Address: **8331 BLERIOT AVE LOS
ANGELES CA 90045**Legal Description: **TR 13436 LOT 3**

Assessment

Total Value: **\$1,310,252**Land: **\$353,825**Structures: **\$956,427**

Other:

% Improved: **72%**

Exempt Amt:

HO Exempt: **N**Tax Rate Area: **065-114**Census Tract: **208.01/2**Price/SqFt: **\$500.00**Year Assd: **2022**Zoning: **8**Use Code: **11**Use Type: **RESID. SINGLE FAMILY**

Sale History

	Sale 1	Sale 2	Sale 3	Transfer
Document Date:	07/29/2022	12/26/2017	08/25/2000	07/29/2022
Document Number:	0311015	0607476	0455656	0311015
Document Type:	GRANT DEED	GRANT DEED	GRANT DEED	
Transfer Amount:	\$1,850,000	\$345,000	\$555,000	
Seller (Grantor):				

Property Characteristics

Bedrooms:	4	Fireplace:		Units:	1
Baths (Full):	3	A/C:		Stories:	
Baths (Half):	1	Heating:		Quality:	
Total Rooms:		Pool:		Building Class:	
Bldg/Liv Area:	3,700	Park Type:		Condition:	
Lot Acres:	26.570	Spaces:	4	Site Influence:	
Lot SqFt:	1,157,389	Garage SqFt:		Timber Preserve:	
Year Built:				Ag Preserve:	
Effective Year:	2020				